

### **Remarks**

Applicants respectfully request reconsideration of the rejections and that the case pass to issue in light of the amendments above and the remarks below.

Claims 1-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,684,119 to Burnard in view of U.S. Publication No. 2003/0101107 to Agarwal et al. In light of cancellation of independent claims 18 and 19, this rejection not only applies to pending independent claim 1.

Independent claim 1 relates to a computer-implemented method to facilitate controlling spare parts inventory within a manufacturing plant having a number of workstations operating in concert to manufacture a product from supplied materials. The plant maintains an inventory of spare parts to be used to repair broken down workstations so that the workstations can continue to manufacture the product from the supplied materials. The method includes associating each spare part in the inventory with identification data and location data and using this data to facilitate responding to spare parts search request in a manner that allows a requestor to identify and locate spare parts within the plant.

Importantly, independent claim 1 differentiates between a spare parts inventory used to support operations of the workstations and a supplied materials inventory used by the workstations to produce a product. The method is particularly focused on identifying and locating the spare parts inventory used to repair operations of the workstations as opposed to identifying and locating the materials inventory used to support manufacture of the product.

In order to properly reject independent claim 1 under 35 U.S.C. § 103(a), the cited references must suggest the claimed process of identifying and locating spare parts within a manufacturing plant that relies upon the spare parts to repair workstations and that also relies upon supplied materials to manufacture a product. The cited references fail to distinguish between spare parts and the supplied materials as required to properly reject independent claim 1.

The Burnard patent relates to a method of providing dynamic production material replenishment information via the internet. The method includes the steps of tracking real-time usage of material usage used for a product, maintaining the tracked real-time material usage within a computer database in a local computer network, and replicating the tracked real-time material usage on a global business network in communication with a local communication network.<sup>1</sup> The Agarwal application relates to an inventory management system and method for maintaining an operable level of inventory. The method includes utilizes existing inventory information to calculate an optimal level of inventory and a process for devising a purchase plan for ordering replenishment inventory to meet the optimal inventory level.<sup>2</sup>

Neither one of the Burnard patent or the Agarwal application suggest the claimed invention because neither reference suggests separately tracking materials consumed by workstations during manufacturing (supplied materials) and the materials used to repair the workstations (spare parts). The cited references merely relate to manufacturing optimization strategies that are directed towards maximizing material utilization and minimizing material costs of the materials consumed by the workstation to produce the product. The cited references are silent with respect to the materials used to repair the workstations. The cited references have nothing to do with supporting spare parts inventories or other inventories required to maintain desirable operations of workstations used to produce a product or facilitate its sale.

The cited references fail to suggest the claimed process of identifying and locating spare parts within a manufacturing plan as required to properly reject independent claim 1 under 35 U.S.C. § 103(a). As such, independent claim 1 claims that independent are patentable and nonobvious over the cited references.

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<sup>1</sup> See, Abstract.

<sup>2</sup> See, Abstract.

Reply to Office Action of July 24, 2008

In view of the foregoing, Applicant respectfully submits that each rejection has been fully replied to and traverse and the case is in condition to pass to issue. The Examiner is respectfully requested to pass the case to issue and is invited to contact the undersigned if further prosecution of the case is at issue.

Please charge any fees or credit any overpayments as a result of the filing of this paper to our Deposit Account No. 02-3978.

Respectfully submitted,

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